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7 Attorneys for Defendant LA FUENTE, INC. dba
8 CHEETAH'S

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 THEODORE TRAPP, on his own behalf and on
12 behalf of all others similarly situated,

13 Plaintiff,

14 vs.

15 BIG POPPA'S, LLC, a Nevada Limited Liability
16 Company d/b/a BADDA BING MEN'S CLUB;
17 SKYTOP VENDING, INC., A Nevada Corporation
18 d/b/a CANCAN ROOM; LA FUENTE, INC., a
19 Nevada corporation d/b/a CHEETAH'S; C.P.
20 FOOD AND BEVERAGE, INC., A Nevada
21 corporation d/b/a/ CLUB PARADISE; DEJA VU
22 SHOWGIRLS OF LAS VEGAS, LLC, a Nevada
23 limited liability company d/b/a DEJA VU
24 SHOWGIRLS OF LAS VEGAS; PALOMINO
25 CLUB, INC., a Nevada corporation d/b/a/
26 PALOMINO CLUB; SHAC, LLC, a Nevada
27 limited liability company d/b/a SAPPHIRE; K-
28 KEL, INC., a Nevada corporation d/b/a
SPEARMINT RHINO; D.2801 WESTWOOD,
INC. a Nevada corporation d/b/a/ TREASURES;
LITTLE DARLINGS OF LAS VEGAS, LLC, a
Nevada limited liability company d/b/a LITTLE
DARLINGS; O.G. ELIADES, A.D., LLC, a Nevada
limited liability company d/b/a OLYMPIC
GARDENS; LAS VEGAS ENTERTAINMENT,
LLC, a Nevada limited liability company d/b/a
LARRY FLYNT'S HUSTLER CLUB; MICHAEL
A. SALTMAN d/b/a MINXX; RICK'S LAS
VEGAS; FRIAS MANAGEMENT, LLC, a Nevada
limited liability company d/b/a ACE CAB
COMPANY and A-NORTH LAS VEGAS CAB;

CASE NO.: 2:09-cv-00995

**DEMAND FOR SECURITY OF
COSTS**

1 WESTERN CAB COMPANY a Nevada
2 corporation d/b/a WESTERN CAB COMPANY
3 and WESTERN LIMOUSINE; NEVADA
4 CHECKER CAB CORPORATION; a Nevada
5 corporation d/b/a CHECKER CAB COMPANY;
6 NEVADA STAR CAB CORPORATION, a Nevada
7 corporation d/b/a/ STAR CAB COMPANY;
8 NEVADA YELLOW CAB CORPORATION, a
9 Nevada corporation d/b/a YELLOW CAB; LUCKY
10 CAB COMPANY OF NEVADA, a Nevada
11 corporation d/b/a/ LUCKY TRANS; SUN CAB,
12 INC., a Nevada corporation d/b/a/ NELLIS CAB
13 COMPANY; CLS NEVADA, LLC, a Nevada
14 limited liability company d/b/a CLS
TRANSPORTATION LAS VEGAS; ON
DEMAND SEDAN SERVICES, LLC, a Nevada
limited liability company d/b/a ODS LIMOUSINE
and ODS CHAUFFEURED TRANSPORTATION;
BLS LIMOUSINE SERVICES OF LAS VEGAS,
INC., a Nevada corporation d/b/a/ BLS
LIMOUSINE SERVICES OF LAS VEGAS;
DESERT CAB, INC., a Nevada corporation d/b/a/
DESERT CAB COMPANY and ODYSSEY
LIMOUSINE; BELL TRANS, A NEVADA
CORPORATION, a Nevada corporation d/b/a
BELL TRANS; TONY CHONG, an individual; and
DOE EMPLOYEES 1-1000,

Defendants.

TO: Plaintiff, THEODORE TRAPP; and

TO: Jay Edelson and Rafey Balabanian of KAMBEREDELSON LLC, and James E. Smyth, II, of
KUMMER KAEMPFER BONNER RENSHAE & FARRARIO, Attorneys for Plaintiff.

Pursuant to NRS 18.130, Defendant, LA FUENTE, INC. dba CHEETAH'S hereby makes
demand upon Plaintiff, who resides out of State, for security in the amount of Five Hundred and
No/100 Dollars (\$500.00) for costs and charges which may be awarded herein against Plaintiff. The
requirements of NRS 18.130 apply to actions in the United States District Court, District of Nevada.

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1 *Truck Ins. Exchange*, 683 F. Supp. 223, 227-28 (D. Nev. 1988); *Hamar v. Hyatt Corp.*, 98 F.R.D.
2 305, 305-306 (D. Nev. 1983).

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5 By: _____/s/
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12 d/b/a CHEETAH'S

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CERTIFICATE OF SERVICE

12 The undersigned certifies that on the 28th day of July, 2009, the **DEMAND FOR**
13 **SECURITY OF COSTS** was electronically served upon all attorneys of record in this matter.

16 _____/s/
17 Jacqueline Delgado
18 Employee of John A. Curtas, Esq.